REMARKS

Applicants respectfully request that the above-identified application be reexamined.

During a review of the drawing figures, it was noted that FIGURES 2 and 3 had missing textual notations. Applicants have attached replacement drawing sheets that include the missing textual notations.

The Office Action mailed on January 5, 2006 (hereinafter "Office Action"), rejected all of the claims remaining in the present application. More specifically, Claims 29-31, 67-69, 101-103, and 105-119 were rejected under 35 U.S.C. § 103(a) as being unpatentable in view of the teachings of U.S. Patent No. 6,623,529, issued to Lakritz (hereinafter "Lakritz") in view of Pei-Chi Wu's "Translation From National Standards to Unicode: Multilingual Support in Operation Systems and Programming Languages - Software-Practice and Experience," January 2000, pp. 765-774 (hereinafter "Wu").

Applicants would initially like to thank the Examiner for the telephone interview that occurred on April 21, 2006, and May 1, 2006. In accordance with the telephone interviews, this response adds further clarifying amendments to the language of Claims 29, 30, 67, 68, 101, and 102, and adds new Claims 120-122.

The following discussions describe why the claims, as amended, further distinguish the present application from the cited references of Lakritz and Wu, and why the rejection of Claims 29-31, 67-69, 101-103, and 105-119 under 35 U.S.C. § 103 in view of the teachings of Lakritz in view of Wu is improper. Applicants have carefully considered the cited references, the comments provided in the Office Action, and the telephone interviews, and respectfully submit that Claims 29-31, 67-69, 101-103, and 105-122 presented herewith are patentable over the prior art.

Prior to discussing the reasons why applicants believe the claims pending in the present application are allowable, brief discussions of the present application and the cited and applied references are presented. The following discussions of the present application and the teachings

of the applied references are not provided to define the scope or interpretation of any of the claims of the present application. Instead, they are provided to help the United States Patent and Trademark Office better appreciate important claim distinctions discussed hereafter.

Present Application

The present application addresses the growing need of information providers to provide content that is both interesting and understandable to diverse users from different parts of the world. The process of providing content that is both interesting and understandable to users from diverse locations is known as localization. For example, a Web page written in English that originated in the United States needs to go through a localization process before it is delivered to a user understanding only French, or to a user understanding English but living in South Africa.

The essence of the invention is to provide a method, a computer-readable medium having computer-executable instructions, and a computer system for localizing content for viewers with diverse language backgrounds and/or geographical locations. In particular, the method, the computer-readable medium having computer-executable instructions, and the computer system extract the localizable portion from a localizable Internet document. The localizable portion is localizable (translatable) according to different languages and/or geographical locations so as to form multiple localized versions. The multiple localized versions are created by an external third party localizer. The method, computer-readable medium having computer-executable instructions, and the computer system receive the multiple localized versions, store the multiple localized versions in a directory hierarchy, convert each localized version of the localizable content into a plurality of encoded versions, and store the encoded versions in the directory hierarchy.

In one exemplary embodiment, the localizable content of a localizable Internet document is isolated from the underlying code by extracting string literals from the code and storing them as symbols. The localizable content is the content that can be localized for a particular user

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based on the language and/or the geographical location of the user. The localizable content is then exported to a localizer for translation to localized content in one or more alternate languages. The localized content is received and stored in a directory hierarchy. The localized content is converted to one or more encoded versions, which are character set supports such as DBCS, Unicode, and UTF-8. These encoded versions are stored in the directory hierarchy as well.

Users with different language backgrounds and/or geographical locations can receive content that they are able to understand and find interesting. Further, server resources are used efficiently. The data storage infrastructure allows a server to support multiple languages and to readily support the addition of new languages. Furthermore, the isolation of localizable content from the underlying code preserves the operability of the underlying code when the localizable content is in the localization process. In addition, the support of different encoded versions allows the localized content to be used on different types of Internet browsers.

Lakritz

Lakritz purportedly teaches a document localization, management, and delivery system. Lakritz automatically determines the language and the country of a Web site and directs the Web server to deliver the appropriate localized content contained in one or more country/language databases to the visitor's browser. The visitor's browser is notified of the proper font needed to display the selected language and is allowed to download the font.

Lakritz further provides a toolkit that allows a master site to be built that is language and country independent. The actual language content is stored in one or more language/country databases. When a visitor enters the master site, the requested document is automatically served in the visitor's language and for the visitor's country by filling in a document template from the master site requesting the correct language content from the language/country database.

Lakritz does not teach or even remotely suggest applicants' invention. For example, nowhere does Lakritz teach or even suggest exporting a localizable portion of an Internet document to a localizer for translation, receiving a multiple localized versions from the localizer, automatically converting each localized version into a plurality of encoded versions, and storing the encoded versions in the directory hierarchy. Nor does Lakritz teach or suggest detecting client request for an Internet document, based on the request, selecting an encoded version, or combining the non-localizable content of the localizable Internet document to form a localized Internet document, and delivering the localized Internet document to the client.

Wu

Pages 765-774 of Wu purportedly discusses character sets as one of the basic issues for information interchange. Wu further states that there are two kinds of strings in programming languages: null terminated strings (in C and C++) and strings tagged with lengths (in Basic and JAVA). In these strings, according to Wu, the character set or encoding format in use is implicitly defined. Hence, there is no way to specify a code page number or an encoding format ID in a string. This limitation works fine when there is only one standard character set and encoding format, but strings cannot handle more than one character set or encoding format.

Wu purportedly proposes a tagged string storage to overcome the above limitation. The tagged string storage has a tag indicating which character set or encoding format is in use, e.g., the default national standard (DEFNS), UCS-1, UCS-2, or UCS-4. Class String written in Java like syntax, according to Wu, has three data fields: tag, length, and contents. The tag field can be 0(DEFNS), 1(UCS-1), 2(UCS-2), and 3(UCS-4). The length is the number of characters, and the contents are a byte array, whose size is determined by the tag and the length of the string. For a single-byte ASCII extension and three UCS formats, size = nbytes(tag).length, where nbytes(0...3) are the widths (in bytes) of character sets 1, 1, 2, and 4, respectively.

Claims Rejections Under 35 U.S.C. § 103

The Office Action rejected Claims 29-31, 67-69, 101-103, and 105-119 as being unpatentable over Lakritz in view of Wu. Applicants respectfully disagree. While applicants disagree with the grounds of rejection cited in the Office Action, in order to advance the prosecution of the present application, several of the claims have been amended to clarify the claim language and further distinguish the present application from the cited references of Lakritz and Wu. As described in more detail below, Lakritz in view of Wu fails to teach, describe, or suggest elements of the independent claims.

A.   Independent Claims 29, 67, and 101

Independent Claims 29, 67, and 101 recite a method, a computer-readable medium, and a system for generating localized versions of Internet documents for delivery to a client according to different languages and/or geographical locations in a manner not taught or suggested by Lakritz. More specifically, Claim 29 is a method claim, Claim 67 is a computer-readable medium claim, and Claim 101 is a computer system claim. All the three claims, in their amended form, specifically recite:

> extracting localizable content from a localizable Internet document that contains both localizable content and non-localizable content, the localizable content being translatable according to different languages and/or geographical locations into multiple localized versions;
>
> exporting the extracted localizable content to a localizer for translation into multiple localized versions;
>
> in response to receiving multiple localized versions from the localizer, storing the multiple localized versions in a directory hierarchy;
>
> converting each of the multiple localized versions into a plurality of encoded versions; and
>
> storing the encoded versions in the directory hierarchy.

Applicants respectfully submit that Lakritz does not teach the subject matter recited in these independent claims. For example, Lakritz does not teach "extracting localizable content

from a localizable Internet document that contains both localizable content and non-localizable content, the localizable content being translatable according to different languages and/or geographical locations into multiple localized versions," "exporting the extracted localizable content to a localizer for translation into multiple localized versions," and "in response to receiving multiple localized versions from the localizer, storing the multiple localized versions in a directory hierarchy" Col. 9, lines 44-57, and Col. 10, lines 40-42, of Lakritz cited in the Office Action appear to teach a Manager's Console that detects when a document in the master language has been updated. The Manager's Console notifies the Web site manager of the corresponding documents in the other language that requires translation. The documents that need translation are extracted from the language and country databases and file systems, and sent to Translation Queues. The present application, on the other hand, claims extracting localizable content from a localizable Internet document that contains both localizable and non-localizable content, exporting the localizable content to a localizer for translation, and receiving multiple localized versions from the localizer after translation.

Further, the Office Action correctly concludes that Lakritz does not specifically teach the conversion of each of the multiple localized versions to a plurality of encoded versions. Since Lakritz does not specifically teach "converting each of the multiple localized versions into a plurality of encoded versions," Lakritz cannot perform the step of "storing the encoded versions in the directory hierarchy." In this regard, the Office Action has incorrectly grouped ". . . storing the multiple localized versions in a directory hierarchy" and "storing the encoded versions in the directory hierarchy."

Applicants further submit that contrary to the statements set forth in the Office Action, it would not be obvious to combine the teachings of Lakritz and Wu. In this regard, the Office Action has failed to establish a prima facie case of obviousness. In particular, U.S. case law requires that an Office Action identify motivation as to why one of ordinary skill in the art would combine two prior art references. The source of motivation may originate from the references

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themselves, the nature of the problem being solved by the references, or the knowledge of one of ordinary skill in the art.

In order to provide motivation for combining Lakritz and Wu, pages 4 and 5 of the Office Actions asserts:

> It would have been obvious to one of ordinary skill in the art at the time of the invention was made to include the feature from Wu in the system of Lakritz because it would have provided the capability for improving multilingual support in operating systems and programming languages without introducing much complexity.

Applicants respectfully submit that this is exactly the type of broad conclusory statement that was held to be insufficient as motivation in both *Dembiczak* (50 U.S.P.Q.2d 1614 (Fed. Cir. 1999)) and *Kotzab* (55 U.S.P.Q.2d 1313 (Fed. Cir. 2000)). There is no teaching or suggestion in Lakritz or Wu to modify either reference or combine their teachings nor is there any basis for concluding that they could be combined. Neither of the references suggest the combination, and applicants submit that there is no basis for concluding that it would be obvious to combine the teachings of these references in any manner, much less in the manner recited in Claims 29, 67, and 101. Further, even if combinable, which applicants categorically deny, the resultant combination, as set forth above, would not meet the recitations of Claims 29, 67, and 101. As a result, applicants respectfully submit that Claims 29, 67, and 101 are clearly allowable in view of the teachings of Lakritz and Wu taken alone or in combination.

B.   Dependent Claims

Since dependent Claims 30, 31, 68, 69, and 102-119 depend from Claims 29, 67, and 101, these claims are submitted to be allowable for at least the same reasons that Claims 29, 67, and 101 are submitted to be allowable.

C.   New Claims

As mentioned above, applicants have added new Claims 120-122. Applicants submit that new Claims 120-122 are patentable over the cited prior art references, both for their dependence

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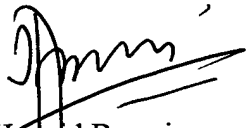on independent Claims 29, 67, and 101, respectively, and for additional subject matter recited therein.

None of the cited prior art references, namely, Lakritz or Wu (alone or combined) teaches, describes, or suggests "detecting a client request for an Internet document," "based on the request, selecting an encoded version from the encoded versions stored in memory," "combining the non-localizable content of the localizable Internet document with the encoded version to form the localized Internet document," and "delivering the localized Internet document to the client," as recited in Claims 120-122. Therefore, Claims 120-122 are submitted to be allowable for reasons in addition to the reasons why the claims from which these claims depend are allowable.

CONCLUSION

In view of the amendments and the foregoing comments, applicants respectfully submit that all of the pending claims in this application, i.e., Claims 29-31, 67-69, and 101-122, are clearly allowable in view of the cited and applied references. As a result, applicants respectfully request that all of the claims remaining in this application be allowed and this application passed to issue. If the Examiner has any questions, she is invited to contact applicants' agent at the number set forth below.
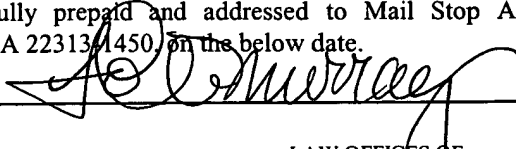
Respectfully submitted,

CHRISTENSEN O'CONNOR
JOHNSON KINDNESS^PLLC

Hunald Basrai
Patent Agent
Registration No. 53,973
Direct Dial No. 206.695.1668

I hereby certify that this correspondence is being deposited with the U.S. Postal Service in a sealed envelope as first class mail with postage thereon fully prepaid and addressed to Mail Stop Amendment, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313/1450, on the below date.

Date: June 5, 2006

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